

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

In Re:

Kelly D. Jull,  
Heather S. Jull,

Debtors.

Chapter 7

Case No. 24-60507

**RESPONSE TO TRUSTEE'S TURNOVER MOTION**

TO: The United States Bankruptcy Court, the United States Trustee, the Chapter 7 Trustee,  
and all parties who have requested notice under Bankruptcy Rule 2002.

The debtors respectfully request that the trustee's turnover motion for their 24 foot enclosed trailer be denied, or in the alternative continued, until which time the Court issues a decision regarding whether the 24 foot enclosed trailer is exempt under Minn. Stat. 550.37(12a).

Dated: February 12, 2025

Velde Moore, Ltd.

/e/ Logan Moore, #312083  
Attorney for the Debtors  
1118 Broadway  
Alexandria, MN 56308  
(320) 763-6561

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Debtor(s).

**UNSWORN CERTIFICATE OF SERVICE**

The undersigned, of the City of Alexandria, County of Douglas, in the State of Minnesota, states that on Wednesday, February 12, 2025, she filed a Response to Trustee's Turnover Motion with the US Bankruptcy Court. All parties receiving electronic service were served by the Court upon the filing of the document. The following parties were served by mail by enclosing a true and correct copy thereof, in an envelope, with first class postage prepaid, and depositing the same in the post office at Alexandria, Minnesota, addressed as follows: NONE

/e/ Kathy Stueve  
Assistant to Logan Moore  
1118 Broadway  
Alexandria, MN 56308  
320-763-6561